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MEMO ENDORSED

July 23, 2020

BY ECF

The Honorable Sidney H. Stein
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Robert Locust, 18 Cr. 289 (SHS)

Dear Judge Stein:

We represent Robert Locust in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006A. On May 28, 2019, following a three-week trial, Mr. Locust was convicted of one count, conspiracy to commit mail and wire fraud. Mr. Locust was not convicted of any substantive offenses. Completion of sentencing is scheduled for July 27, 2020.

The purpose of this letter is to respectfully request a three-month adjournment of Mr. Locust’s completion of sentencing based on the COVID-19 pandemic and health crisis. It is presently unsafe for Mr. Locust, or counsel, to travel to lower Manhattan to appear in person. Additionally, Mr. Locust needs to appear in person and therefore, does not wish to proceed remotely. Lastly, we also note that Mr. Locust’s motion for reconsideration of his sentencing and objection the Government’s request for restitution as it pertains to him, is pending. Accordingly, we believe that an adjournment of sentencing is necessary.

We respectfully request an adjournment of sentencing until October. I have discussed this application with AUSA Alexandra Rothman and the Government objects.

Thank you for your consideration.

Respectfully submitted,

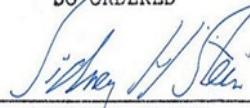
/s/

Anthony Cecutti
Mitchell Dinnerstein

The continuation of the sentencing is adjourned to October 7, 2020, at 9:30 a.m.

Dated: New York, New York
July 24, 2020

SO ORDERED


SIDNEY H. STEIN
U.S.D.J.